DOCUMENT RESUME

ED 197 700 HE 013 499

AUTHOR Parrish, Richard M.
TITLE A Study of the Relationship Between Eligibility for Licensing in Various Professions and Accreditations for the State of Delaware, Maryland, New Jersey, New York, and Pennsylvania.
INSTITUTION Commission on Higher Education, Newark, N.J. Middle States Association of Colleges and Secondary Schools.
PUB DATE Feb 80
NOTE 52p.: Appendices may not reproduce well due to light type.

EDRS PRICE MF01/PC03 Plus Postage.
DESCRIPTORS *Accreditation (Institutions): *Certification: Certified Public Accountants: Comparative Analysis: Dental Hygienists: Eligibility: Higher Education: *Paraprofessional Personnel: Pharmacists: Physical Therapists: Professional Education: *Professional Personnel: Psychologists: State Licensing Boards: *State Standards: State Surveys
IDENTIFIERS Delaware: Maryland: New Jersey: New York: Pennsylvania: *United States (Mid Atlantic States)

ABSTRACT

Licensure laws in Delaware, Maryland, New Jersey, New York, and Pennsylvania were reviewed to determine the extent to which the licensing boards in this region were requiring accreditation in professional licensing qualifications. The following professions were considered: certified public accountant, dental hygienist, pharmacist, physical therapist, and psychologist. For each of the five professions, information is provided on typical job responsibilities, the formal name of the licensing board for each state, the legal requirement as stipulated in the state statute detailing the minimum postsecondary education required to be eligible to take the licensing examination, and the effective date for this legislation. This date applies to the most recent change for any of the candidacy requirements including age, resident status, experience, and others. In addition, a table is presented that tabulates by profession and by state: (1) the presence or absence of wording in statute specifying required postsecondary education in an accredited institution or program: (2) the actual practices of licensing boards requiring an accredited education: and (3) miscellaneous comments. It was found that in none of the five states were professions requiring licensure actually coordinated by one central state office or agency, and the states have comparable minimal education requirements for licensing for the five professions. For each of the five states, a list of all occupations and the appropriate citation within the state regulations is presented. (SW)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED197700

A STUDY OF THE RELATIONSHIP BETWEEN ELIGIBILITY FOR LICENSING IN VARIOUS PROFESSIONS AND ACCREDITATION FOR THE STATES OF DELAWARE, MARYLAND, NEW JERSEY, NEW YORK AND PENNSYLVANIA

Richard M. Parrish
Research Associate

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Richard M. Parrish

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

HE 013 489

Commission on Higher Education
Middle States Association of Colleges and Schools

February, 1980

RECD NSA FEB 19 1980

ACKNOWLEDGEMENTS

This project was supported with funds obtained from the Commission on Higher Education, Middle States Association of Colleges and Schools. Facilities and equipment at Ocean County College were used in the research and preparation of this study. The author was encouraged to conduct the study by Dr. Robert Kirkwood, Executive Director, M.S.A., Commission on Higher Education and Dr. H. R. Kells, Professor of Higher Education and Information Studies, Rutgers University, New Brunswick, New Jersey. Special thanks are extended to Anna Booth for preparation of the final manuscript, Dr. Raymond Salman, Director of Professional Licensing for New York State for his advice and assistance, various licensing board secretaries and board members in the five states included in this study for their assistance and finally to Dr. Kirkwood and Dr. Kells, who reviewed the report draft and made valuable suggestions regarding its content.

The Author: Richard M. Parrish is Director of Institutional Research at Ocean County College, Toms River, New Jersey and is a doctoral candidate at Rutgers University.

CONTENTS

Background and Purpose of the Study

Methodology

Limitations

Presentation of the Findings

Description and Educational Requirements for Licensing Eligibility for the following Professionals:

- Certified Public Accountant
- Dental Hygienist
- Pharmacist
- Physical Therapist
- Psychologist

Summary

Some Recommendations

References

Appendix

A Occupations Licensed, Registered or Certified in Delaware

B Occupations Licensed, Registered or Certified in Maryland

C Occupations Licensed, Registered or Certified in New Jersey

D Occupations Licensed, Registered or Certified in New York

E Occupations Licensed, Registered or Certified in Pennsylvania

A Study of the Relationship Between Eligibility
for Licensing in Various Professions and Accreditation
for the States of Delaware, Maryland, New Jersey,
New York and Pennsylvania

The uses of postsecondary accreditation is a topic of continual importance to the accrediting bodies, the higher education community and the general public at large. It would be virtually impossible to compile a single all-inclusive accurate listing of the uses of accreditation. However, some of the major uses include: 1) helping students choose educational institutions and programs of study; 2) establishing eligibility for federal funding and, in some cases, using accreditation as screening criteria for awarding private grants; 3) protecting institutions from harmful internal and external pressures; 4) creating an environment on campuses conducive to self-study and self-improvement; 5) involving the faculty and staff in evaluation, planning and creative problem-solving; 6) establishing preferences in employment opportunities; 7) screening candidates for admission to graduate schools; and 8) establishing eligibility to sit for licensing examinations for various professions, such as architecture, dentistry, medicine, accounting, etc. [1] The use of accreditation in order to establish eligibility to sit for professional licensing examinations is the focus of this study.

The primary purpose for professional licensing is to protect the public from dishonest and, most of all, incompetent practitioners. Licensing is therefore focused on the individual practitioner. In contrast, accreditation focuses its efforts at the program or institutional levels with its primary purpose to assure the general public, the educational community and public and private organizations that a program or institution has clearly defined and appropriate objectives, appears to be accomplishing them substantially and has the human, fiscal and physical resources to continue to do so. In addition, programmatic accreditation focuses its attention on maintaining standards of good practice in the field. Accreditation is a voluntary means of controlling the quality of postsecondary education at both the program and institutional levels.

Overall, the quality of an education that a student receives in an accredited program and/or institution should be superior to that received in an unaccredited institution or program. However, accreditation cannot possibly mean that every student graduating from an institution or program is qualified to practice in the corresponding profession. Conversely, a student who acquires knowledge through other than formal education or from an unaccredited institution or program may indeed be qualified to practice in the profession. With regard to the former, the United States Department of Health, Education and Welfare, in its

1971 report on licensure and related health personnel credentialing and again in 1977, recommended that state professional licensing boards should take steps to provide credit for knowledge and skills gained outside of the formal educational setting. [2,3] Regarding the latter, it may be inappropriate, some argue, for licensing boards to require graduation from an accredited program or institution. Whether or not they are correct, the extent to which the licensing boards require an accredited education ought to be examined.

In order to understand the extent to which the licensing boards in the Middle States accrediting region were requiring accreditation in professional licensing qualifications, it was the purpose of this study to review the licensure laws in Delaware, Maryland, New Jersey, New York and Pennsylvania describing fully the relationship between eligibility to sit for licensing examination and accreditation. For example, does eligibility to take the certified public accountancy examination depend upon completion of an accredited program, graduation from an accredited school, or is eligibility unrelated to accreditation? Secondly, what are the legal requirements written into state statutes or the rules and regulations adopted by the state licensing boards under statutory power?

METHODOLOGY

The primary source of information examined in this study were the individual state statutes for the five states in the Middle States region. The information found in these statutes and updated addenda was supplemented by personal telephone calls to licensing board secretaries and other administrative state officials. In many states and professions, the statutes allow the licensing board the authority to determine the appropriateness of the educational experience of the applicant. In these cases, the telephone calls were used to solicit the criteria the licensing boards use to determine an equivalent educational background to that stipulated in the statute.

Due to the exploratory nature of this study, the number of professions examined was limited to the following five:

(1) certified public accountant,
(2) dental hygienist,
(3) pharmacist,
(4) physical therapist, and
(5) psychologist.

These five professions all require a license in Delaware, Maryland, New Jersey, New York and Pennsylvania and also require a college education or its equivalent. Over one hundred occupations in one or more of the five states require certification, registration or licensing, (see appendices). About half of these occupations require at least some college education or its equivalent.

Limitations of the Study

Due to the exploratory nature of this study, the limitation to five professions in five states and the lack of random selection, the reader is cautioned that the findings may not be representative of all professions in all states. The most up-to-date information was collected from a law library in December, 1979. Even though the sample was small and not randomly selected, all of the professions in the five states have a similar pattern of accredited educational requirements. Therefore, one can probably assume that the general relationships found in this study may be representative of all professions in the five states under study.

PRESENTATION OF THE FINDINGS

The results of the study will be presented in the following order and format. For each of the five professions (certified public accountant, dental hygienist, pharmacist, physical therapist and psychologist) a separate data sheet has been prepared listing the following information:

1) occupation name,
2) general information including a description of typical job responsibilities,
3) the formal name of the licensing board for each state,
4) the legal requirement as stipulated in the state statute detailing the minimum postsecondary education required to be eligible to take the licensing examination, and
5) the effective date for this legislation. This date applies to the most recent change for any of the candidacy requirements including age, resident status, experience and others. Even though the state legislative body may not have changed the educational requirement, it is assumed for purposes of this study that the requirement was reviewed.

In most cases, the actual wording, as it appeared in the statutes, has been reproduced. However, in some cases, for simplicity, the author has paraphrased the actual wording.

Finally, a table has been prepared tabulating by profession, by state: (1) the presence or absence of wording in statute specifying required postsecondary education in an accredited institution or program; (2) the actual practices of licensing boards, re., requiring an accredited education; and (3) miscellaneous comments.

Certified Public Accountant

As can be seen in the data sheet for certified public accountants, the specificity of the state statutes regarding the postsecondary educational requirement necessary to sit for the licensing examination varies from state to state. Two of the five states, Delaware and Maryland, actually stipulate in statute that the education must have been received in an accredited college/university or program. New Jersey and Pennsylvania state licensing boards require, by their own rules, regulations or actual practices, that the education be received from a regionally accredited institution. New York requires that in-state candidates must have graduated from a New York Regents approved college and program, and out-of-state candidates must be graduates of either a regionally accredited college or nationally accredited program. New York also has a provision for external degree examination through Empire State College where the candidate did not pursue a formal postsecondary education.

In the northeast section of the United States, during the last few years, a large number of foreign candidates have applied for licensing in various professions. In some of the states for some professions, the foreign students are allowed to take the licensing examination after their educational credentials have been evaluated as to their equivalency to United States standards. Examples of this foreign student accommodation are present in Maryland and New Jersey for the certified public accountant profession. Candidates from foreign countries in these two states, and possibly others, have their educational credentials reviewed by the American Institute of Certified Public Accountants to determine its equivalency. A report is made to the licensing boards which, in turn, makes the final decision. In some states, the foreign students are directed to matriculate at a United States accredited college, receiving credit for their home country education and eventually graduating from the United States college. Then they apply for the licensing examination. The accommodation of foreign students appears to be dependent on two major factors; first, supply and demand and second, political decisions.

Three of the five state statutes have been revised in the last three years with the other two being revised nine years ago.

Occupation: Certified Public Accountant

General Information: The accountant compiles, analyzes and prepares accounting records for the purpose of giving advice or preparing various statements such as: profit and loss, balance sheets, cost studies and tax returns. The accountant may specialize in auditing, tax work, real estate, budgeting and control, cost accounting or systems and procedures. [4]

For the State of Delaware[1] the postsecondary educational requirement stipulated in statute, regulated by the Delaware State Board of Accountancy is as follows:

1) Hold a master's degree conferred by a college or university recognized by the board at the time of graduation with a concentration in accounting or what the board determines to be substantially the equivalent of such concentration; or
2) Hold a baccalaureate degree, conferred by a college or university recognized by the board at the time of graduation, with a concentration in accounting or what the board determines to be substantially the equivalent of such concentration; or
3) Hold a degree from a two-year college, accredited by the Middle States Association of Colleges and Secondary Schools, the Accrediting Commission of the Association of Independent Colleges and Schools or a similar accrediting association recognized by the board at the time of graduation, with a concentration in accounting, or what the board determines to be substantially the equivalent of such concentration. Eff. Jan. 1, 1976

For the State of Maryland the postsecondary educational requirement stipulated in statute, regulated by the Maryland State Board of Public Accounting, on and after July 1, 1974, is as follows: A baccalaureate or a higher degree with a major in accounting as defined by the board, or with a nonaccounting major supplemented by what the board determines to be substantially the equivalent of an accounting major, awarded by a school or college that is a member of the American Association of Collegiate Schools of Business, or by a school or college (or by a constituent unit of such institution) that is accredited by the Middle States Association of Colleges and Secondary Schools, or the equivalent regional accrediting association for other regional areas, or by any other institution approved and recognized by the board. Eff. 1971

For the State of New Jersey the postsecondary educational requirement stipulated in statute, regulated by the New Jersey State Board of Certified Public Accountants is as follows: The candidate must have a B.A. degree or its equivalent as determined by the New Jersey Department of Higher Education. The board may admit to the exam a candidate who demonstrates that he has acquired through experience and substantial formal higher education the equivalent of the B.A. Eff. Aug. 18, 1977

For the State of New York the postsecondary educational requirement stipulated in statute, regulated by the N.Y. State Board for Public Accountancy is as follows: Have received an education, including a bachelor's or higher degree based on a program in accountancy, in accordance with the commissioner's regulations. In lieu of the professional requirements ... fifteen years in the practice of public accountancy satisfactory to the board may be accepted by the department. Eff. Sept. 1, 1971

---

[1]What appears to be three different educational requirements is a result of not including the corresponding experience requirements.

Occupation: Certified Public Accountant (continued)

For the State of Pennsylvania the postsecondary educational requirement stipulated in statute, regulated by the Pennsylvania State Board of Examiners of Public Accountants is as follows:

a. (1) Graduation with a baccalaureate degree from a college or university approved at the time of graduation by Department of Education, pursuant to policies and standards promulgated by the State Board of Education, or an education which is the equivalent thereof, and completion of at least twelve semester credits in accounting subjects of a content satisfactory to the board, not necessarily as part of his undergraduate work, or

(2) Graduation with a Master's Degree in Accounting or Business Administration or an equivalent Master's Degree from a college or university approved at the time of graduation by Department of Education, pursuant to policies and standards promulgated by the State Board of Education and completion of at least twelve semester credits in accounting subjects of a content satisfactory to the board, not necessarily as part of his undergraduate or graduate work, and at least one year of public accounting experience of a caliber satisfactory to the board.

(3) Subject to the general qualifications, the board may issue a certificate of certified public accountant to a person who has qualified for permission to take the examination under section 4 (a)(1) or (2) provided he has passed the written examination of the board in general accounting, theory of accounts, accounting practice, auditing and such other subjects as the board shall determine to be appropriate.

b. As an alternative to sections 4(a)(1) and (2), a person may be permitted to take the examination without meeting the experience requirements as provided in sections 4(b)(3) and (4) hereof, if the board shall be satisfied that he has complied with one of the following requirements:

(1) Graduation with a baccalaureate degree from a college or university approved at the time of graduation by the Department of Education, or an education which is the equivalent thereof, and completion of at least twenty-four semester credits in accounting subjects of a content satisfactory to the board, not necessarily as a part of his undergraduate work, or

(2) Graduation with a Master's Degree or a Doctor's Degree from a college or university approved at the time of graduation by the Department of Education and completion of at least twenty-four semester credits in accounting subjects of a content satisfactory to the board, not necessarily as part of his undergraduate or graduate work.

(3) Subject to the general qualifications of section 3.1, the board may issue a certificate of certified public accountant to a person who has qualified for permission to take the examination under section 4(b)(1) provided he has passed the written examination of the board in general accounting, theory of accounts, accounting practice, auditing and such other subjects as the board shall determine to be appropriate and, further provided he has at least two years of public accounting experience of a caliber satisfactory to the board.

(4) Subject to the general qualifications of section 3.1, the board may issue a certificate of certified public accountant to a person who has qualified for permission to take the examination under section 4(b)(2) provided he has passed the written examination of the board in general accounting, theory of accounts, accounting practice, auditing and such other subjects as the board shall determine to be appropriate, further provided he has at least one year of public accounting experience of a caliber satisfactory to the board.

c. Notwithstanding the provisions of section 4(b) above, the board may, in its discretion, permit an applicant to take the examination during the final term, semester or quarter of the school year in which he will graduate, if it is reasonably expected that he will fulfill the educational requirements of section 4(b) and receive the required degree: Provided, however, that he must receive the required degree within ninety days after the date of the examination in order to fulfill the educational requirements set forth in section 4(b). Eff. Dec. 8, 1976

Dental Hygienist

All five of the states have in statute a prescribed minimum postsecondary educational requirement to determine eligibility for the licensing examination. Four of the five states have reviewed and possibly changed these statutes in the last seven years. New Jersey last changed its statute on this issue in 1948. Not one of the states require in statute that the education must have been earned in an accredited institution or program. In practice, however, the licensing boards of Delaware, Maryland, New Jersey and Pennsylvania, by their own regulations, require that the candidate be a graduate of a program accredited by the American Dental Association, (ADA).

In New York State the in-state candidate must be a graduate of a college and program approved by the New York Board of Regents. Out-of-state graduates are allowed to take the licensing examination in New York State, provided their educational requirements meet the minimums and they are graduates of either a regionally accredited institution or a program accredited by the ADA.

Occupation: Dental Hygienist

General Information: The dental hygienist works to prevent dental decay by removing calcareous deposits, accretions, tarter and stains from teeth using rotating brush and compounds. Hygienists may take and develop x-rays, administer local anesthetic agents, make mode impressions and remove sutures. Communicating to patients proper dental health care is an important function of hygienists. [4]

For the State of Delaware the postsecondary educational requirement stipulated in statute, regulated by the Delaware State Board of Dental Examiners is as follows:

a. The individual must furnish satisfactory proof that he is a graduate of a high school approved by the board and of a training school for oral hygienists requiring a course of not less than one year academic and approved by the board. In addition, the applicant must show satisfactory proof of one year clinical experience in a school institutional or public work setting, or
b. The applicant must show satisfactory proof that he is a graduate of a high school approved by the board and that he is also a graduate from a two-year approved academic course in a training school for oral hygienists. Eff. 6/18/76

For the State of Maryland the postsecondary educational requirement stipulated in statute, regulated by the State Board of Dental Examiners of the State of Maryland is as follows: The applicant shall be a graduate of a school for dental hygienists requiring at least two years of study that is approved by the State Board of Dental Examiners. Eff. 1972

For the State of New Jersey the postsecondary educational requirement stipulated in statute, regulated by the New Jersey State Board of Dentistry is as follows: Every applicant shall present to the board a diploma or certificate from a dental school or college approved by the board, showing that such applicant was graduated or satisfactorily completed a course in dental hygiene. Eff. 1948

For the State of New York the postsecondary educational requirement stipulated in statute, regulated by the New York State Board for Dentistry is as follows: Have received an education, including high school graduation and completion of a program in dental hygiene, in accordance with the commissioner's regulations. Eff. 4/1/76

For the State of Pennsylvania the postsecondary educational requirement stipulated in statute, regulated by the Pennsylvania State Dental Council and Examining Board, is as follows: The board has the power to license as a dental hygienist, after examination, any duly qualified person, ..., who has obtained the required education, together with a certificate or diploma from an approved institution or college for the training of dental hygienists, or who in lieu of such education has had five or more years experience in the practice of dental hygiene .... Eff. 9/7/72

Pharmacist

The statutes for pharmacists are more restrictive, re., accreditation, for licensing eligibility than they are for either the certified public accountant or dental hygiene professions. Three of the five states, Delaware, Maryland and Pennsylvania, require in statute that the candidate shall be a graduate of a college with a program in pharmacy accredited by the American Council on Pharmaceutical Education (ACPE). The New Jersey Board of Pharmacy requires by its own rules that the candidate meeting the minimal educational requirements be a graduate of either a regionally accredited college or a program accredited by the ACPE. In New York State the candidate having attended a New York college must be graduate of a college and pharmacy program approved by the New York Board of Regents. Candidates graduating from out-of-state colleges must have graduated from regionally accredited institutions or programs accredited by the ACPE. Pennsylvania is the only state that has not changed its statute regarding the eligibility for licensing pharmacists in the last ten years.

Occupation: Pharmacist

General Information: The pharmacist compounds and dispenses medications prescribed by physicians, dentists and other licensed practitioners. Those in retail pharmacies also dispense nonprescription medication to the public. The pharmacist will advise patients regarding potential drug interactions and reactions and storage of medication. [4]

For the State of Delaware the postsecondary educational requirement stipulated in statute, regulated by the Delaware State Board of Pharmacy is as follows: An applicant shall have graduated from a school or college of pharmacy accredited by the American Association of Colleges of Pharmacy at the time of graduation. Eff. 5/17/74

For the State of Maryland the postsecondary educational requirement stipulated in statute, regulated by the Maryland Board of Pharmacy is as follows: An applicant shall be a graduate of a school or college of pharmacy approved by the said board or accredited by the American Council on Pharmaceutical Education, as published in their official listing. Eff. 7/1/73

For the State of New Jersey the postsecondary educational requirement stipulated in statute, regulated by the Board of Pharmacy of the State of New Jersey, is as follows: An applicant shall have been duly graduated or have met all of the requirements for graduation from a pharmacy course given in a school or college of pharmacy approved by the board and complying with the rules and regulations of the board. Eff. 12/29/70

For the State of New York the postsecondary educational requirement stipulated in statute, regulated by the New York State Board of Pharmacy is as follows: An applicant shall have received an education, including a bachelor's degree or equivalent degree in pharmacy, in accordance with the commissioner's regulations. Eff. 4/1/76

For the State of Pennsylvania the postsecondary educational requirement stipulated in statute, regulated by the Pennsylvania State Board of Pharmacy, is as follows: An applicant shall have a degree in pharmacy granted by a school or college of pharmacy which is accredited by the American Council of Pharmaceutical Education or its successor. Eff. 9/27/61

Physical Therapist

The physical therapist, by state statute, in Delaware, Maryland and Pennsylvania, must be a graduate of a college having a physical therapy program approved by either the Council on Medical Education of the American Medical Association or the American Physical Therapy Association. According to New Jersey statute, an applicant for registration as a physical therapist must have completed an accredited course in physical therapy education.

In New York State, the applicant shall have completed a four-year college B.A. program in physical therapy approved by the New York Board of Regents. Candidates with out-of-state postsecondary educational credentials must have graduated from a regionally accredited college or nationally accredited program. Each of the five states have reviewed and/or changed the applicant qualification statute within the last four years.

The State of Maryland had the most recent change with its statute, 7/1/79. Unique to the Maryland statute is the provision for candidates educated in a foreign country. Although all state licensing boards deal with foreign students according to certain rules, regulations or practices, Maryland is the only state to set forth in statute wording speaking to the issue of foreign students.

Occupation: Physical Therapist

General Information: The physical therapist plans and administers medically prescribed physical therapy treatment programs for patients to restore function, relieve pain and prevent disability following disease, injury or loss of body part. They give exercises designed to correct muscle ailments and deficiencies to patients, administer massage and perform other body manipulations. [4]

For the State of Delaware the postsecondary educational requirement stipulated in statute, regulated by the Delaware State Examining Board of Physical Therapists is as follows: The applicant shall present satisfactory evidence that he has graduated from a school of physical therapy approved for training physical therapists by the appropriate sub-committee of the American Medical Association, or if graduated prior to 1936, the school or course was approved by the American Physical Therapy Association at the time of his graduation. Eff. 8/3/76

For the State of Maryland the postsecondary educational requirement stipulated in statute, regulated by the Maryland State Board of Physical Therapy Examiners is as follows: If educated in the United States or Puerto Rico, be a graduate of a physical therapy curriculum which, in the year of graduation, was approved by the Council on Medical Education of the American Medical Association or the American Physical Therapy Association and provide evidence of graduation from and satisfactory completion of the clinical training required by the curriculum; or if educated in a foreign country, be a graduate of a physical therapy curriculum which has educational requirements comparable to those approved by the Council on Medical Education of the American Medical Association or the American Physical Therapy Association and complete a preceptorship in the United States that fulfills requirements that the Board sets. Eff. 7/1/79

For the State of New Jersey the postsecondary educational requirement stipulated in statute, regulated by the State Board of Medical Examiners is as follows: An applicant for registration as a physical therapist shall submit to the board evidence, in such form as the board may prescribe, that the applicant has completed a program of education approved by the board. An approved program for physical therapists shall include the following: (a) a minimum of 60 academic semester credits or its equivalent from a recognized college, including courses in the biological and physical sciences; or a diploma from an accredited school of professional nursing and in addition (b) an accredited course in physical therapy education which has provided adequate instruction in the basic sciences, clinical sciences, and physical therapy theory and procedures as determined by the advisory committee and approved by the board. Eff. 8/16/75

For the State of New York the postsecondary educational requirement stipulated in statute, regulated by the New York State Board for Physical Therapy is as follows: The applicant shall have received an education, including completion of a four-year college program in physical therapy, in accordance with the commissioners regulations, provided that after April 1, 1973, such requirements shall include a bachelor's or equivalent degree. Eff. 4/1/76

For the State of Pennsylvania the postsecondary educational requirement stipulated in statute, regulated by the Pennsylvania State Board of Physical Therapy, is as follows: To be eligible for licensure as a physical therapist, an applicant must have an education of not less than 60 semester hours of college credits or the equivalent thereof including courses in biological, physical and social studies at an accredited college or

university and has attended an accredited physical therapy course of not less than 12 months, in a school of physical therapy established in a fully accredited medical school, hospital, college or university which course has provided curricula and training, the requirements of which shall be approved from time to time by the board with advice and consultation with recognized national accrediting agencies and professional organizations including the American Physical Therapy Association. By the time of completion of the professional study of physical therapy, a physical therapist must hold a minimum of a baccalaureate degree from a regionally accredited institution of higher education. In the case of those applicants who have completed requirements prior to the first day of January, 1967, but who may not technically or totally fulfill the above requirements, the board at its discretion and by the majority vote of all members present may accept evidence of satisfactory equivalence. Eff. 10/10/75

Psychologist

The psychologist is the only one of the five professions included in this study requiring the completion of a doctoral level postsecondary education. Maryland, New Jersey and New York require the doctorate, whereas Delaware and Pennsylvania allow the master's degree coupled with more years of supervised experience. The state statutes in Delaware, Maryland and Pennsylvania stipulate that the candidate be a graduate of an accredited college or university. In New York, the candidates educated in New York must be graduates of a Regents approved program and college. Candidates educated out-of-state must be graduates of a regionally accredited institution or a nationally accredited program. New Jersey, at the present time, allows a candidate to demonstrate to the state licensing board of physchological examiners the equivalency of their education if learned through non-formal experiences. This is an alternative to the more common education of receiving a doctorate from an accredited college or university. Although the non-formal educational experience is permitted, the New Jersey State Legislature is currently reviewing a bill to eliminate this provision in law. Foreign students applying for licensing in New Jersey must forward their credentials to the California Credential Evaluation Service to determine its equivalency. New Jersey last changed its statute in 1966, Pennsylvania in 1972, Maryland in 1973, Delaware in 1974 and New York in 1976.

Occupation: Psychologist

General Information: A psychologist is concerned with how people act and why they act in the way they do. The psychologist usually concentrates in one of the following specialities: clinical, social, preventive, developmental, industrial, educational or experimental psychology. [4]

For the State of Delaware the postsecondary educational requirement stipulated in statute, regulated by the Delaware State Board of Examiners of Psychologists, is as follows: Any applicant for the private practice of psychology shall submit evidence, verified by oath and satisfactory to the Board, that such person has received a doctoral degree based in part upon a psychological dissertation and on a program of studies, the content of which was primarily psychological, from an accredited college or university having a graduate program in psychology, and who:

a. Has had, after receiving the doctoral degree, at least 2 years of supervised experience in psychological work of a type satisfactory to the Board; or
b. Has had at least 5 years of supervised experience after receiving the master's degree, provided that such person has the doctoral degree. Eff. 3/18/74

For the State of Maryland the postsecondary educational requirement stipulated in statute, regulated by the Maryland State Board of Examiners of Psychologists, is as follows: The applicant shall have received the doctoral degree based on a program of studies whose content was primarily psychological from an accredited educational institution having an appropriate graduate program, or a program of studies judged by the board to be equivalent in both subject matter and extent of training. Eff. 7/1/73

For the State of New Jersey the postsecondary educational requirement stipulated in statute, regulated by the New Jersey State Board of Psychological Examiners, is as follows: Any person applying to the board, after 1/1/68 must have received the degree of Doctor of Philosophy in psychology from a recognized educational institution, or in lieu of such a degree, a doctoral degree in a closely allied field if it is the opinion of the board that the training required thereof is substantially similar, or has otherwise had training in psychology deemed equivalent by the board. Eff. 1966

For the State of New York the postsecondary educational requirement stipulated in statute, regulated by the New York State Board for Psychology, is as follows: The applicant shall have received an education, including a doctoral degree in psychology, granted on the basis of completion of a program of psychology registered with the department or the substantial equivalent thereof, in accordance with the commissioner's regulations. Eff. 4/1/76

For the State of Pennsylvania the postsecondary educational requirement stipulated in statute, regulated by the Pennsylvania Board of Psychologist Examiners, is as follows: The candidate must be either (1) a graduate of an accredited college or university holding a degree of Doctor of Philosophy or Doctor of Education in psychology plus two years of post doctorate experience acceptable to the board, or (2) a graduate of an accredited college or university holding a doctoral degree in a field related to psychology, provided his experience and training are acceptable to the board as being equivalent to the above, or (3) a graduate of an accredited college or university holding a master's degree in psychology or another of the behavioral sciences plus four years of experience provided his education and experience are acceptable to the board. Eff. March 23, 1972

Table 1 is a tabulation by profession, by state, revealing the relationship between eligibility to sit for five different professional licensing examinations and the presence or absence of an accredited educational experience, either stipulated by statute or mandated by licensing board rules and regulations. Physical therapy is the most restrictive profession according to statute with four of the five states requiring that the candidate be a graduate of an accredited program. Pharmacy and psychology are the next most restrictive by statute having three of five states requiring graduation from either an accredited college or program. Two states require, in statute, an accredited educational experience for the certified public accountant. Dental hygiene has the least restrictive statutes with regard to accredited education, none of the five states refer to accreditation in statute.

Most important is not what is stipulated in statute but what are the practices of the licensing boards regarding the certification of the minimum educational experiences. With few exceptions, the New Jersey psychologist and the evaluation of foreign student credentials by some boards, the professional licensing boards regulating certified public accountants, dental hygienists, pharmacists, physical therapists and psychologists in the States of Delaware, Maryland, New Jersey, New York and Pennsylvania require an accredited educational experience. The licensing boards utilize extensively the following two publications to identify accredited institutions and programs:

1) 1979-80 Accredited Institutions of Postsecondary Education Programs Candidates, published for the Council on Postsecondary Accreditation by the American Council on Education.
2) Education Directory, Colleges & Universities, 1978-79, published by the National Center for Education Statistics.

In addition, the approved list of programs accredited by the specialized accrediting agencies such as the American Dental Association are used extensively.

Table 1 The Relationship Between Eligibility for Licensing in Five Professions and Education at Accredited Institutions or Programs in the States of Delaware, Maryland, New Jersey, New York & Pennsylvania

Occupation	State	Accredited Educ. Specified in State Statute				Accredited Educ. Mandated By Licensing Board Rules[1]				Comments
		1[2]	2[3]	3[4]	4[5]	5[2]	6[3]	7[4]	8[5]	
Certified Public Accountant	Del.			Yes, for A.A. only				Yes, for B.A. or M.A.		
	Md.			X				X		Candidates from foreign countries have the educational record reviewed by the American Institute of C.P.A. to determine its equivalency.
	N.J.				X	X				Same as above.
	N.Y.				X			X		The state has a provision for external degree examination where the candidate did not pursue a formal postsecondary educ. In-state candidates must be graduates of a N.Y. Regents approved college and program.
	Pa.				X	X				
Dental Hygienist	Del.				X		X			
	Md.				X		X			
	N.J.				X		X			
	N.Y.				X			X		In-state candidates must be graduates of a N.Y. Regents approved program and college.
	Pa.				X		X			
Pharmacist	Del.		X				X			
	Md.		X				X			
	N.J.				X			X		
	N.Y.				X			X		In-state candidates must be graduates of a N.Y. Regents approved program and college.
	Pa.		X				X			
Physical Therapy	Del.		X				X			
	Md.		X				X			
	N.J.		X				X			
	N.Y.				X			X		In-state candidates must be graduates of a N.Y. Regents approved program and college.
	Pa.	X	X				X			

[1] Rules formulated by the licensing boards under interpretation of statute.

[2] Columns 1 & 5 refer to institutional accreditation by a regional accrediting agency, e.g. M.S.A.

[3] Columns 2 & 6 refer to programmatic accreditation by a specialized accrediting agency, e.g. A.D.A.

[4] Columns 3 & 7 refer to either institutional or programmatic accreditation.

[5] Columns 4 & 8 refer to the fact that an accredited education (institutional or programmatic) is not specified.

Table 1 - continued

Occupation	State	Accredited Educ. Specified in State Statute				Accredited Educ. Mandated By Licensing Board Rules[1]				Comments
		1[2]	2[3]	3[4]	4[5]	5[2]	6[3]	7[4]	8[5]	
Psychologist	Del.	X				X				
	Md.	X				X				
	N.J.				X			X		Foreign national candidates have their educati reviewed by the California Credential Evaluati Service to determine equivalency. Current statutes allow U.S. citizens as candidates to demonstrate to the board the equivalency of their education if learned through non-formal experiences. However, a bill is currently in the state legislature to eliminate this provision.
	N.Y.				X			X		In-state candidates must be graduates of a N.Y. Regents approved program and college.
	Pa.	X				X				

[1]Rules formulated by the licensing boards under interpretation of statute.

[2]Columns 1 & 5 refer to institutional accreditation by a regional accrediting agency, e.g. M.S.A.

[3]Columns 2 & 6 refer to programmatic accreditation by a specialized accrediting agency, e.g. A.D.A.

[4]Columns 3 & 7 refer to either institutional or programmatic accreditation.

[5]Columns 4 & 8 refer to the fact that an accredited education (institutional or programmatic) is not specified.

SUMMARY

The following summary comments seem justified from the data and the telephone interviews conducted with various licensing board secretaries, board members and other state officials:

1) In none of the five states were all professions requiring licensure actually coordinated by one central state office or agency. The extent of coordination varied however, from a high of about 90% in New York State to a relatively low level, approximately 0.
2) The five states included in this study have, for the most part by profession, comparable minimal educational requirements for licensing CPA's, dental hygienists, pharmacists, physical therapists and psychologists.
3) The extent to which state statutes actually require graduation from an accredited program or institution in order to sit for a licensing examination varied by profession studied. It ranged from none of the states requiring such accredited graduation in the field of dental hygiene to four of the states in the field of physical therapy.
4) However, with few exceptions, the New Jersey psychologist and the accommodation of foreign students by a few boards, the licensing boards by their own rules and regulations developed under statutory interpretation, require all candidates for licensure to be graduates of an accredited institution or program. NOTE: The New Jersey legislature is currently considering a revision to statute, eliminating a provision allowing a candidate to demonstrate the equivalency of his psychological education and training.
5) The licensing of foreign nationals, educated outside of the United States, is dealt with inconsistently from state to state and profession to profession. Some licensing boards have the foreign students' educational credentials evaluated by private credentialing services, while other boards do not accept foreign students at all.
6) Twenty-two of the twenty-five state statutes regulating the qualifications of candidates for licensing in the professions studied were changed in some way in the decade of the 70's. Approximately 50 percent were changed in the last five years.

SOME RECOMMENDATIONS

It would seem that several areas of study should be explored further. First, this study was limited to only five professions. Certainly, if these data are to be the basis of forming a change in policy, they should be augmented by studying the

licensing requirements in additional fields. Second, it would be interesting to extend these studies to other geographical areas of the United States.

This researcher found it very difficult to obtain information from one central state source regarding such minimal items as: 1) the name of each professional licensing board in the state; 2) the address and telephone number for each board, and 3) a contact person or position for each board. One state department of higher education official responsible for academic planning was somewhat embarrassed that he could not provide a source document indicating all the licensing boards in the state. It would seem appropriate for each state to develop and revise, on a yearly basis, a professional licensing publication including at least the items cited above. This document should be widely distributed.

A more fundamental and perhaps philosophical question that needs further discussion at many levels of authority throughout the United States is whether or not accreditation should be used as a screening device for the determination of eligibility to sit for professional licensing examinations. Are the accreditation standards in specialized accreditation and the general purposes of institutional accreditation consistent enough with the theoretical content of licensing examinations to serve appropriately as a screening device? Certainly, institutional accreditation does not seem to serve such a purpose. Indeed, it may unjustly screen out qualified applicants. The question of the use of specialized accreditation would seem to rest on the validity of the standards to guarantee professional quality. On the face of it, or certainly in the absence of such validation studies, the use of the accreditation requirement would seem to be an unnecessary and possibly unfair double screening. Either the licensing examination is a completely valid instrument or it isn't.

When accreditation is inextricably tied to professional licensure, are we in some sense employing a philosophy of overkill? State licensure cannot be considered an island unto itself, beholden only to professional interests. Rather, it must be regulated in light of ever-changing societal demands.

REFERENCES

[1] Miller, Jerry, "Social Values and Uses of Accreditation," ERIC/AAHE, No. 7, 1972, pp. 31-38.

[2] U.S. Department of Health, Education and Welfare. Report on Licensure and Related Health Personnel Credentialing, DHE Publication No. (HSM) 72-11, June, 1971, p. 75.

[3] ------, Credentialing Health Manpower, DHE Publication No. (OS) 77-50057, July, 1977, p. 16.

[4] Costello, Joan M. and Rita Persont Wolfson, editors. Concise Handbook of Occupations. Chicago, Illinois: J.G. Ferguson Publishing Company, 1976.

The state statutes utilized in this study are not cited. The reader is directed to the appendices for specific citations with regard to the professions included in this study.

APPENDIX A

DELAWARE

Occupation	Citation	Form of State Regulation	
Accountant, certified public	24-104	C	
Agricultural products dealer	3-3502	R	
Architect	24-318	L	
Attorney	Sup.Ct.R.31	L	
Audiologist	24-3705	L	(1973)
Barber	24-409	L	
Student	24-428	L	
Apprentice	24-409	R	
Boxer	28-133	R	
All personnel associated with boxing	28-133	R	
Chauffeur	21-2754	L	
Check seller	5-2302	R	
Chiropractor	24-707	L	
Contractor: Electrical, master general	24-1423	L	
Electrical, master limited	24-1423	L	
Electrical, master special	24-1423	L	
Cosmetology/Hairdressing Personnel:			
Cosmetologist/Hairdresser	24-605	L	
Apprentice	24-605	R	
Student	24-605	R	
Demonstrator	24-605	L	
Electrologist	24-605	L	(1975)
Instructor, cosmetology/hairdressing	24-605	L	(1975)
Junior	24-605	L	
Instructor, electrology	24-605	L	
Manicurist	24-605	L	
Shampooist	24-605	R	(1975)
Shop manager	24-605	L	
Dairy products buyer	3-3161	R	
Deadly weapons dealer	24-901	R	
Dental hygienist	24-1151	L	
Dentist	24-1122	L	

Delaware (cont'd.)

Occupation	Citation	Form of State Regulation	
Driver training instructor	21-8304	L	
Embalmer	24-3108	L	
Apprentice (resident trainee)	24-3105	L	
Employment Agency operator	29-8810	R	
Engineer, professional	24-2806	L	
In-Training	24-2806	L	
Funeral director (funeral service)	24-3108	L	
Fur dealer	7-553	R	
Game breeder	7-561	R	
Geologist, professional	24-3602	L	
Grain moisture testing device operator	3-1604	L	
Harbor pilot	23-111	L	
Hearing aid dealer and fitter	16-2008	L	
Insurance Personnel:			
Adjuster	18-1710	L	
Agent	18-1710	L	
Broker	18-1710	L	
Broker, surplus line	19-1912	L	
Solicitor	18-1710	L	
Investment advisor	6-7313	L	
Landscape architect	24-206	L	(1975)
Masseur/masseuse	24-1612	R	
Milk and/or cream: sampler	3-3114	L	
tester	3-3113	L	
weigher	3-3114	L	
Meat inspector	3-8709	R	
Nurse, licensed practical	24-1913	L	

Delaware (cont'd.)

Occupation	Citation	Form of State Regulation	
Nurse, registered	24-1913	L	
Nursing home administrator	16-1205	L	
Optometrist	24-2114	L	
Osteopath	24-1754	L	
Pharmacist	24-2523	L	
Assistant	24-2523	L	
Physical therapist	24-2607	L	
Physician/Surgeon	24-1732	L	
Plumber	16-7906		R
Podiatrist	24-504	L	
Poultry buyer	3-6501		R
Private detective	24-1304		R
Psychologist	24-3505	L	
Race track personnel (harness racing)	58-501		R
Radiologic technologist	new legislation	L	
Real estate agent (salesperson)	24-2921	L	
Real estate broker	24-2921	L	
School teacher	14-1202	C	
Securities agent	6-7313	L	
Securities broker	6-7313	L	
Small loan maker	5-2101		R
Social worker (licensed clinical)	31-3720	L	(1976)
Speech pathologist	24-3705	L	
Surveyor, land	24-2722	L	
Taxi driver	21-2754	L	
Veterinarian	24-3303	L	

Delaware (cont'd.)

Occupation	Citation	Form of State Regulation
Well driller	7-6023	L
Wrestler	28-133	R
All personnel associated with wrestling	28-133	R

MARYLAND

Occupation	Citation	Form of State Regulation
Accountant, Public, Certified	75a - 11	L
Architect	43 - 516	L
Attorney	10 - 2	L
Auctioneer	56 - 13	R
Audiologist	43 - 791	L (1976)
Barber Personnel:		
Apprentice (journeyman)	43 - 315	L
Instructor	43 - 318	L (1975)
Professional	43 - 314	L
Student	43 - 315	R
Boxer	56 - 112	R
All Personnel	56 - 112	R
Camp Counselor		C
Chauffeur	32 - 5	L
Collection Agency Operator	56 - 3214	R (1977)
Contractor Services:		
Home Improvements	56 - 255	L
Salesperson	56 - 255	L
Refridgeration	56 - 217	L
Well Drilling	96a - 31	L
Cosmetology/Hairdressing Personnel:		
Cometologist/Hairdresser	43 - 530	L
Apprentice	43 - 530	R
Demonstrator	43 - 531	L
Instructor	43 - 530	L
Manicurist	43 - 533	L
Shop Manager (operator)	43 - 530	L
Currency Exchanger	11 - 207	R

Occupation	Citation	Form of State Regulation
Dairy Products Personnel:		
Milk and/or Cream Distributor	43 - 570	R
Measurer	AG11 - 405	L
Processer	43 - 570	R
Producer	43 - 570	R
Sampler	AG11 - 405	L
Tester	AG11 - 405	L
Weigher	AG11 - 405	L
Dental Services:		
Dentist	32 - 5	L
Hygienist	32 - 27	L
Instructor (school teacher)	32 - 5	L
Technician	32 - 5	L
Driver, Training Instructor	TR15 - 802	R
Egg Processor	43 - 210	L
Electrician		L
Electronic Repairer		L
Embalmer	43 - 345	L
Apprentice	43 - 358	R
Employment Agency Operator	56 - 163	R
Employment Counselor	56 - 161	R
Agent (theatrical	56 - 163	R
Agent (visa service)	56 - 163	R
Engineer Personnel:		
In-Training	75½ - 12	L
Professional	75½ - 12	L
Stationary	75½ - 12	L
Fish/Game Services:		
Clam Dealer	NR 4 - 1027	R
Crab Fisher	NR 4 - 804	R
Crab Packer and Shipper	NR 4 - 807	R
Fish Breeder	NR 4 - 623	R
Fur Dealer	NR10 - 506	R
Game Breeder	NR10 - 901	R
Guide (commercial hunting)	NR10 - 309	R
Oyster Buyer	NR10 - 1016	R
Oyster Packer and Dealer	NR 4 - 307	R

Occupation	Citation	Form of State Regulation
Forester	56 - 299	L (1972)
Funeral Director	43 - 345	L
Geologist		C
Harbor Pilot	74 - 5	L
Apprentice	74 - 4	L
Hearing Aid Dealer and Fitter	43 - 739	L
Horse Racing Personnel	56 - 255	R
All Personnel	78b - 1	R
Insurance Services:		
Adjuster	48a - 181	L
Agent	48a - 167	L
Broker	48a - 167	L
Broker (surplus line)	48a - 188	L
Landscape Architect	56 - 273	L (1971)
Land Surveyor	56 - 335	L
In-Training (certified)	56 - 335	L
Librarian	ED23 - 103c	C
Livestock Dealer	AG 3 - 303	R
Masseuer/Masseuse		L
Midwife	48 - 83	L
Mine Fire Boss	NR 7 - 303	L
Foreman	NR 7 - 303	L (1975)
Mortgage Broker		L
Motor Vehicle Personnel:		
Dealer	TR15 - 302	R
Dealer (fuel)	56 - 157e	R
Salesperson	TR15 - 402	R
Wrecker	TR15 - 502	R

Occupation	Citation	Form of State Regulation
Nurse, Practical (licensed)	43 - 296	L (1975)
Registered	43 - 295	L
Nursing Home Administrator	43 - 771	1 (1970)
Optometrist	43 - 372	L
Osteopath	43 - 474	L
Outdoor Advertiser	TR 8 - 708	R
Pest Control Services:		
Pest Control Applicator (structural)	AG 5 - 207	L
Pest Control Consultant	AG 5 - 207	L
Pest Control Operator (structural)	AG 5 - 207	L
Pesticide Applicator (custom)	AG 5 - 207	L
Pesticide Applicator (public)	AG 5 - 207	L
Pesticide Applicator (private)	AG 5 - 207	L
Petroleum Transporter	56 - 148	R
Pharmacist	43 - 249	L
Physical Therapist	43 - 608	L
Assistant	43 - 608	L
Physician/Surgeon	43 - 122	L
Plumber (master)	43 - 239	L
Apprentice	43 - 333	L
Contractor	43 - 333	R
Inspector	43 - 333	L
Journeyman	43 - 333	L
Podiatrist	43 - 481	L
Poultry Broker	AG 4 - 213	R
Wholesaler	AG 4 - 213	R
Private Detective	56 - 76	L
Private School Agent (solicitor)	77 - 147	R
Property Line Surveyor (registered)	56 - 335	L

Occupation	Citation	Form of State Regulation
Psychologist	43 - 629	C
Real Estate Agent	56 - 217	L
Broker	56 - 217	L
Riding Stable Operator	56 - 129	R
Sanitarian (registered)	43 - 727	L
In-Training (registered)	43 - 728	L
School Bus Operator	ED 6 - 103	L
School Teacher		C
Securities Agent	CA11 - 402	L
Broker (dealer)	CA11 - 401	L
Slaughterhouse Operator	AG 4 - 131	R
Small Loanmaker	58a - 1	R
Social Worker (Independent Practice)	43 - 868	L (1975)
Associate	43 - 868	L (1975)
Certified	43 - 868	L (1975)
Graduate	43 - 568	L (1975)
Speech Pathologist	43 - 791	L (1976)
Surface Mining Operator	NR 7 - 504	R (1969)
Tobacco Sales Commission Agent	AG 7 - 209	R
Commission Selling Agency Weigher	AG 7 - 209	R
Person in Charge of Leaf Account	AG 7 - 209c-1	R
Sales Floor Buyer	AF 7 - 209	R
Sales Floor Seller	AG 7 - 209	R
Transfer Buyer	AG 7 - 209	R
Tree Expert/Surgeon	NR 5 - 407	L
Veterinarian	43 - 152	L

Occupation	Citation	Form of State Regulation
Wastewater Treatment Plant Operator	43 - 403a	L (1969)
Superintendent	43 - 403a	L (1969)
Superintendent (industrial)	43 - 403a	L (1969)
Water Works Plant Operator (superintendent)	43 - 403a	L (1969)
Weighmaster	AG11 - 503	L
Wrestler	56 - 112	R
All Personnel	56 - 112	R

APPENDIX C

NEW JERSEY

Occupation	Citation	Form of State Regulation
Accountant, certified public	45:2A-5	L
Aircraft pilot	6:1-39	L
Architect	45:3-5	L
Attorney	2A:170-73	L
Barber	45:4-29	L
Apprentice	45:4-29	L
Barbershop owner	45:4-50.2	L
Boiler engineer and steam fireman	37:7-1	L
Boiler, pressure vessel and refrigeration plant inspector	34:1-44	L
Cattle, sheep or swine dealer/broker	4:11-3	R
Check casher	17:15A-2	R
Check issuer	17:15B-3	R
Check seller	17:15B-3	R
Chiropractor	45:9-41.14	L
Collection agent	45:18-1	R
Commission merchant (agricultural commodities)	4:11-3	R
Commission merchant broker-dealer	4:11-18	R
Controlled atmosphere storage facility operator	4:10-28	R
Cosmetology/Hairdressing Personnel:		
Cosmetologist/Hairdresser	45:4A-5.1	L
Student	45:4A-5.1	R
Demonstrator	45:4A-5.1	L
Instructor (teacher)	45:4A-5.1	L
Manicurist	45:4A-5.1	L
Shop manager	45:4A-5.1	L

New Jersey (cont'd.)

Occupation	Citation	Form of State Regulation
Dairy Products Personnel:		
Milk inspector	26:1A-41	L
Milk and/or cream: buyer	4:12-2	R
sampler	4:12-41.5	L
tester	4:12-41.4	L
weigher	4:12-41.5	L
Dental hygienist	45:6-35	L
Dentist	45:6-11	L
Driver training instructor	39:12-5	R
Driver training school operator	39:12-2	R
Electrical contractor	45:5A-9	L
Embalmer	45:7-9	L
Employment agent	34:8-26	R
Engineer, professional	45:8-27	L
Engineer-in-training	45:8-27	L
Explosives handler (manufacture, sale, storage, transportation and use)	21:1A-133	L
Firearms retailer	2A:151-24	R (1971)
Employees	2A:151-24	R (1971)
Firearms wholesaler	2A:151-19	R (1971)
Employees	2A:151-19	R (1971)
Fish and Game:		
Clam fisher	50:2-1	R
Fish breeder	23:3-63	R
Fishing preserve operator	23:3-29	R
Game breeder (game preserve)	23:3-29	R
Nutria breeder	4:2A-3	R
Oyster fisher	50:2-1	R
Sea clams dredger	50-2-6.1	R
Food and drug inspector	26:1A-41	L
Frozen dessert plant operator	24:10-73.10	R
Fuel distributor/salesman (solid)	51:8-5	R
Fundraiser, professional	45:17A-9	R (1971)
Funeral director	45:7-9	L
Harbor pilot (Sandy Hook), deputy	12:8-14	L

New Jersey (cont'd.)

Occupation	Citation	Form of State Regulation
Health officer	26:1A-42	L
Hearing aid dealer and fitter	45:9A-1	L (1973)
Hiring agent or pier superintendent	32:23-13	R
Home improvements salesperson/contractor (home repair)	17:16C-77	R
Horse racing personnel	5:5-33	R
Insurance Personnel:		
Agent	17:22-6.6	L
Broker	17:22-6.6	L
Broker, surplus line	17:22-6.52	L
Solicitor	17:22-6.6	L
Investment advisor	49:3-56	L
Librarian	45:8A-1	C
Assistant	45:8A-1	C
Longshoreman	32:23-27	R
Marriage counselor	45:8B-5	L (1969)
Meat inspector	26:1A-42	L
Medical lab director (bioanalytical lab)	45:9-42.4	L
Medical lab director (clinical lab)	45:9-42.28	L (1975)
Medical lab technician (public health lab)	26:1A-42	L
Midwife	45:10-2	L
Motor vehicle installment seller	17:16C-2	R
Movers, public	48:22-6	R
Nurse, licensed practical	45:11-26	L
Nurse, registered	45:11-26	L

New Jersey (cont'd.)

Occupation	Citation	Form of State Regulation
Real estate agent (salesperson)	45:15-1	L
Real estate broker	45:15-1	L
Refrigerated warehouse or locker plant operator	24:9-22	R
Sales finance operator	17:16C-2	R
Sanitary inspector	26:1A-42	L
School teacher	18A-6-41	C
Securities agent	49:3-56	L
Securities broker-dealer	49:3-56	L
Shorthand reporter, certified	45:15A-4	L
Small loan maker	17:10-2	R
Solicitor, professional	45:17A-9	R (1971)
Steam engineer	34:7-2	L
Stevedore	32:23-19	R
Surveyor, land	45:8-27	L
Swine dealer	4:5-106.4	R
Tree expert or surgeon	13:1-35	L
Veterinarian	45:16-7	L
Veterinary meat inspector	26:1A-42	L
Wastewater treatment plant operator (sewage)	58:11-15	L
Water treatment plant operator (water purification)	58:11-14	L
Weighing or measuring devices dealer, second-hand	51:1-114	R
Weighing or measuring devices installer, second-hand	51:1-114	R
Weighing or measuring devices repairer, second-hand	51:1-114	R
Well driller	58:4A-6	L

New Jersey (cont'd.)

Occupation	Citation	Form of State Regulation	
Nursing home administrator	30-11-11	L	(1970)
Optician (opthalmic dispenser)	45:1-3.1	L	
Technician	45:1-3.1	L	
Optometrist	45:12-5	L	
Orthoptist	45:12A-1	L	
Osteopath	45:9-5.1	L	
Pharmacist	45:14-6	L	
Apprentice	45-14-6	L	
Physical therapist	45:9-37.2	L	
Assistant	45:9-37.2	L	(1975)
Physician/Surgeon	45:9-6	L	
Plumber	45:14C-1	L	
Plumbing inspector	26:1A-42	L	
Podiatrist	45:5-3	L	
Port watchman	32:23-39	R	
Poultry agent	4:11-38	R	
Poultry dealer-broker	4:11-38	R	
Private detective	45:19-11	L	
Professional planner	45:14A-8	L	
Planner-in-training	45:14A-8	L	
Psychologist	45:14B-1	L	
Radiologic technologist	45:25-3	L	

NEW YORK

Occupation	Citation	Form of State Regulation
Accountant, certified public	Educ.-Art. 149	L
Acupuncturist	Educ.-6523	L (1975)
Ambulance attendant/emergency medical technician	Pub. H.-Art. 30 §3000	L (1974)
Animal health technician	Educ.-Art. 135	L (1976)
Apartment referral agent	Gen.Bus. 446-a Art. 12-c	L (1975)
Architect	Educ.-Art. 147	L
Attorney	Jud. 53-520.1	L
Audiologist	Educ.-Art. 159	L (1974)
Barber Apprentice	Gen.Bus. Art. 28-432 " " "	L "
Billiard room owner	Gen.Bus. Art. 28-C-460	L
Blaster	Gen.Bus. Art. 28-D-482	L (1975)
Bondsman, bail	Ins.-Art. 10-331	L
Boxer All personnel associated with boxing	Unconsol. 8933 " "	L "
Budget Planner	Bank.-Art. 12-C-580	R (1975)
Check Casher	Bank.-Art. 9-A-367	R
Chiropractor	Educ.-Art. 132	L
Commission merchant	Agri.&M-Art. 20-251	R
Commission merchant dealer/broker	" " " "	R
Contractor, well drilling	Environm. Conserv.-Art. 15	R
Cosmetologist/hairdresser Shop license	Gen.Bus.-Art. 27-403 " " "	L L
Crane operator	Gen.Bus.-Art. 28-D-482	L (1975)

Occupation	Citation	Form of State Regulation
Dairy products personnel:		
Milk dealer	Agric.&M-Art. 21-257	R
Milk gathering station manager	" " 4-57	R
Milk and/or cream: sampler	" " " "	L
tester	" " " "	L
weigher	" " " "	L
Dental hygienist	Educ.-Art. 133	L
Dentist	Educ.-Art. 133	L
(Embalmer - Since 1944 there has been no separate license as embalmer-Since that date there has been only the one license as funeral director)		
Employment agency operator	Gen.Bus.-Art. 11-172	R
Engineer, professional	Educ.-Art. 145	L
Engineer-in-training (intern)	" " "	(neither L,C, or R applies)
Fish and game:		
Bait dealer	Environm. Conser.-Art. 11-1315	R
Farm fish pond owner/lessee	" " " " 1911	R
Fishing preserve operator	" " " " 1913	R
Fur-bearing animal breeder	" " " " 1907	R
Domestic game animal breeder	" " " " 1905	R
Game bird breeder	" " " " 1901	R
Guide (hunting, fishing)	" " " " 0533	L
Hunting (shooting) preserve operator	" " " " 1903	R
Taxidermist	" " " " 1733	L
Fishing personnel:		
Commercial fisher (inland)	Environm. Conser.-Art. 11-1503	L
Commercial shellfish digger	" " " 13-0311	R
Shellfish grower	" " " 13-0313	R
Shellfish shipper and processor	" " " 13-0315	R
Food salvager	Agric.& M-Art. 17B-218	R
Funeral director	Pub.H.-Art. 34-3421	L
Harbor pilot:		
Master of public vessels	Navig. 64-Art. 4-Part II	L
Engineer of public vessels	" " " "	L
Joint pilot & engineer of public vessels	" " " "	L
Hudson River pilots	" 91-A, Art. 6	L
Long Island Sound-Block Island pilots	" 91-B, Art. 6	L
Sandy Hock pilots	" 90, Art. 6	L
Hearing aid dealer	Gen. Bus.-Art. 37-780	L (1975)

Occupation	Citation	Form of State Regulation
Hearing aid dealer	Gen.Bus.-ARt. 37-780	L (1975)
Horse racing personnel:		
Thoroughbreds	Unconsol. 7915	R
Harness	" 8010	R
Quarter horse	" 8040	R
Insurance personnel:		
Adjuster	Ins.-Art.6-123	L
Agent (life)	" " " 113	L
Agent (property)	" " " 115	L
Broker	" " " 119	L
Broker, surplus line	" " " 122	L
Landscape architect	Educ.-Art. 148	L
Laser operator	Gen.Bus.-Art. 28-D-482	L (1975)
Lender, licensed (small loan maker)	Bank.-Art. 9-341	L
Librarian	Educ. 279	C
Masseur/masseuse	Educ.-Art. 155	L
Medical lab director (clinical lab)	Pub.H.-Art. 5-573	L
Notaries public	Domes. Rel. 11	L
	C.P.L.R. 3113	L
	Real Prop. 290	L
	Bank. 335	L
	Exec. 140	L
	Election 3039	L
	Pub. Officers 3	L
Nurse, licensed practical	Educ.-Art. 139	L
Nurse, registered professional	Educ.-ARt. 139	L
Nursing home administrator	Pub.H. 28-D-2896	L (1970)
Occupational therapist	Educ.-Art. 156	L (1975)
Occupational therapy assistant	Educ.-Art. 156	C (1975)
Ophthalmic dispenser (optician)	Educ.-Art. 144	L
Optometrist	Educ.-Art. 143	L
Physician (Osteopath)	Educ.-Art. 131	L
Pesticide applicator	Environm. Conserv. 33-0904	L
Pharmacist	Educ.-Art. 137	L
Physical therapist	Educ.-Art. 131-A	L

Occupation	Citation	Form of State Regulation
Physician	Educ.-Art. 131	L
Physician's assistant	" " 138-B	R
Specialist's assistant	" " 131-B	R (1975)
Podiatrist	Educ.-Art. 141	L
Private investigator (detective)	Gen.Bus.-Art. 7-72	L
Private patrol agent	Gen.Bus.-Art. 7-74	L
Processing plant operator	Agric. &M-Art. 20-C-251-Z-3	R
Psychologist	Educ.-ARt. 153	L
Radiologic technologist	Pub.H.-Art. 35-3502	L
Real estate agent (salesperson)	Real prop.-Art. 12-A, 441	L
Real estate broker	" " " " "	L
Refrigerated locker plant operator (warehouse)	Agric.&M- Art. 19, 231	R
Rendering plant operator	Agric. &M-Art. 5C, 96-z-1	R
School teacher	Educ. 3001	C
Shorthand reporter, certified	Educ.-Art. 151	L
Slaughterhouse operator	Agric. & M.-ARt. 5-A, 96-b	R
Small loan maker (see licensed lender)		
Social worker, certified	Educ.-Art. 154	L
Speech pathologist	Educ.-Art. 159	L (1974)
Steamship ticket agent	Gen.Bus.-Art 10, 150	R
Surveyor, land	Educ.-Art. 145	L
land surveyor-in-training (intern)	" " "	(neither L,C or R applies)
Transmitters of money	Bank.-Art. 13-A, 641	R
Upholstery and bedding mfgrs. (renovators and second-hand dealers)	Gen.Bus.ARt. 25-A,383	R
Veterinarian	Educ.-Art. 135	L
Watchman/guard	Gen.Bus.-Art. 7,72	L
Weighmaster	Agric.&M-Art. 16-A, 195	L
Wrestler	Unconsol. 8933	R
All personnel associated with wrestling	" "	R

Other titles regulated by Agriculture and Markets:

Animal Health Permit issued to cattle dealers or auctioneers	Agric. &M-	Art. 5,	Sec.90
Baby Chick Permit issued to sellers ...	"	" Art. 15-A,	Sec. 175-M
Commercial Feed Registration issued to manufacturers	"	" Art. 8,	Sect. 129
Live Pest Permit issued to transporters..	"	" Art. 14,	" 164-A
Nursery Certificate (owners or operators cannot sell without certificate)	"	" Art. 14,	" 166
Frozen Dessert Mfgrs. Permit	"	" Art. 4-A,	" 71-C
Kennel Owner's License	"	" Art. 7,	" 110
Melloream mfgrs. license	"	" Art. 4,	" 50-G
Oleomargarine Processor license	"	" Art. 4,	" 61
Fertilizer Distributor's license	"	" Art. 10,	" 146
Soil and Plant Innoculant license	"	" Art. 10-A,	" 147-B
Lining Materials (seller's) license	"	" Art. 9A,	" 142-EE

APPENDIX E

PENNSYLVANIA

Occupation	Citation	Form of State Regulation
Accountant, Certified, Public	63 - 9.1	C
Registered	63 - 9.89	C
Animal Broker-Dealer	3 - 432	R
Ambulance Attendant (emergency medical tech)	35 - 6804	C (1976)
Architect	63 - 21	L
Attorney	17 - 1602	L
Auctioneer	63 - 706	L
Apprentice	63 - 706	L
Barber Personnel:		
Apprentice	63 - 551	L
Instructor (teacher)	63 - 551	L
Professional	63 - 551	L
Shop manager	63 - 553.1	L
Biological Laboratory Operator	35 - 2154	R
Blood Bank Director	35 - 6507	R
Boiler Inspector	35 - 1305	L
Bondsman	19 - 90.2	R
Boxer	4 - 3	R
All personnel associated with boxing	4 - 3	R
Camp Manager/Operator	22 - 3002	R
Chiropractor	63 - 602	L
Contractor Services:		
Well Driller	32 - 645.2	R
Cosmetology/Hairdressing Personnel:		
Cosmetologist/Hairdresser	63 - 522	L
Instructor	63 - 522	L
Manicurist	63 - 522	L
Shop Manager	63 - 522	L

Occupation	Citation	Form of State Regulation
Milk and/or Cream:		
Sampler	31 - 700j-603	L
Tester	31 - 700	L
Weigher	31 - 700j-603	L
Milk Dealer	31 - 700j-401	R
Milk Handler	31 - 700j-401	R
Milk Inspector (approved)	31 - 645	L
Milk Transporter (hauler)	31 - 700j-510	R
Dental Services:		
Dentist	63 - 121	L
Hygienist	63 - 129	L
Driver, Training Director	24 - 2834	L
Instructor	24 - 2834	L
Egg Grader (separating operator)	31 - 294a	R
Elevator Inspector	35 - 1344	L
Embalmer	63 - 479-2	L
Apprentice (trainee)	63 - 479-2	L
Engineer Personnel:		
In-Training	63 - 149	L
Professional	63 - 149	L
Explosives Handler	75 - 159	R
Farm Produce Dealer	3 - 41c	R
Fish/Game Services:		
Bait Dealer	30 - 170.1	R
Ferret and Fitch Breeder	34 - 1311.413	R
Fish Breeder	30 - 170	R
Fur-bearing Animal Breeder	34 - 1311.414	R
Fur Dealer	34 - 1311.406	R
Employees	34 - 1311.406	R
Game Breeder	34 - 1311.407	R
Hunting Preserve Operator (shooting)	34 - 1311.410	R
Mink Farmer (propagator)	34 - 1376.2	R
Taxidermist	34 - 1311.406	R
Funeral Director	63 - 479.3	L

Occupation	Citation	Form of State Regulation
Frozen Dessert Plant Operator	31 - 417-7	R
Garbage Feeder (animal)	3 - 452.1	R
Harbor Pilot (bay and river pilot)	55 - 42	L
Apprentice	55 - 44	R
Hearing Aid Dealer and Fitter	35 - 6700-301	L (1976)
~~Horse racing~~ Race track Personnel (harness)	15 - 2603	R
Insurance Services:		
Adjuster	40 - 304	L
Agent	40 - 233	L
Broker	40 - 233	L
Broker, surplus line	40 - 233	L
Investment Advisor	70 - 33	R
Solicitor	70 - 33	R
Kennel Operator	3 - 460-208	R
Landscape Architect	63 - 902	C
~~Land~~ Surveyor, land	63 - 151	C
Librarian	24 - 4206	C
Mattress Auctioneer ~~(bedding)~~ Bedding	35 - 980e	R
Salesperson	35 - 979a	R
Midwife	63 - 171	L
Mining Personnel:		
Electrical Inspector	52 - 70-108	L
Examiner	52 - 70-201	L
Fire Boss	52 - 70-201	L
Foreman	52 - 70-201	L
Assistant	52 - 70-201	L
Miner	52 - 70-201	L
Motor Vehicle Personnel:		
Damage Appraiser	63 - 853	R
Dealer	63 - 804	R
Manufacturer	63 - 804	R
Salesman	63 - 804	R

Occupation	Citation	Form of State Regulation
Moving Picture Projectionist	35 - 1227	L
Apprentice	35 - 1227	R
Nurse, Practical (licensed)	63 - 211	L
Registered	63 - 652	L
Nursery Stock Dealer	3 - 214.10	R
Nursing Home Administrator	63 - 1101	L
Oil and Gas Inspector (State employee)	58 - 255	L
Optometrist	63 - 232	L
Osteopath	63 - 262	L
Pawnbroker	63 - 281.9	R
Pest Control Services:		
Pesticide Applicator, commercial	3 - 111.36	L (1974)
Pesticide Applicator, private	3 - 111.37	L (1974)
Pesticide Applicator, public	3 - 111.38	L (1974)
Pesticide Dealer	3 - 111.32	R (1974)
Pest Management Consultant	3 - 111.34	L (1974)
Pharmacist	63 - 390.3	L
Physical Therapist	63 - 1301	L
Physician/Surgeon	63 - 401a	L
Podiatrist	63 - 42.1	L
Poultry Technician	63 - 641	L
Private School Agent (trade school)	24 - 1725.7	R
Prospector, mineral	32 - 144	R
Psychologist	63 - 1201	L
Real Estate Agent	63 - 432	L
Broker	63 - 432	L
School Teacher	24 - 12.1202	C

Occupation	Citation	Form of State Regulation
Securities Agent (salesperson)	70 - 33	R
Broker (dealer)	70 - 33	R
Slaughterhouse Operator (equine)	3 - 451.4	R
Small Loan Broker	7 - 6151a	R
Stevedore	55 - 211	R
Ticket Broker	4 - 202	R
Veterinarian	63 - 485.9	L
Waste Water Treatment Plant Operator	24 - 10535	C
Weather Modifier	3 - 1101	L
Weighmaster	76 - 347	R
Wrestler	4 - 3	R
All personnel	4 - 43	R